

Kolak, Shari

From: Smith, Madelyn [Madelyn.Smith@epa.state.oh.us]
Sent: Friday, November 22, 2013 1:04 PM
To: Kolak, Shari
Cc: Reed, Allison
Subject: ETCA - Expanded Phase II SAP Addendum Comments

Shari,

I have finished reading through the SAP Addendum; however, I was unable to finish my review of the document as information that a majority of the proposed work depends on has not been presented.

We approved the MIP work plan separately in September so that the MIP results could guide the waterloo and other sampling that needs to be conducted. The MIP work was done the weeks of October 21- November 1. On November 7, SulTRAC submitted the "Expanded Phase II SAP Addendum" outlining the waterloo sampling, soil sampling, surface water sampling, sub-slab sampling, ground water sampling, and surface soil sampling intended to address the data gaps agreed upon during past conference calls. The SAP Addendum proposes to address these data gaps but fails to present any of the information needed to determine if the proposed work will actually meet this goal. No information is provided about what was learned from the MIP sampling that led to the proposed sampling locations. Instead, the SAP Addendum caveats the proposed sampling locations as dependent upon MIP results and access agreements.

I have two initial, general comments:

1. Page 2 of the MIP WP states that the purpose of the MIP work was to, *"identify locations and horizons within the suspected source areas, and downgradient areas, that contain elevated levels of total VOCs. This information will be used to focus subsequent investigation activities."* A summary discussion of the MIP data needs to be incorporated into the SAP Addendum so the links between the MIP results and the proposed sampling locations are clear. Those sections of the SAP which propose sampling locations contingent on MIP results need to be amended to provide a summary of the MIP information and to provide the rationale for the proposed sampling based on that information. Ohio EPA does not doubt SulTRAC's ability to interpret the data and propose further sampling; however, we cannot complete a review of the SAP Addendum until the information supporting the proposed sampling is presented.
2. An update on samples that cannot be collected due to lack of access agreements would be beneficial: It was mentioned in the field during the MIP work that some samples could not be collected due to access issues. Much of the sampling proposed in the SAP Addendum depends upon access agreements with property owners. Is there a plan for obtaining access or other courses of action in the event access is denied?

I have not received final comments from Allison, Ohio EPA's ground water reviewer, on the SAP Addendum – Because the proposed waterloo and soil sampling locations depend upon the MIP results, specific comments on ground water work will be forthcoming once the MIP results have been incorporated into the SAP Addendum.

If you have any questions or wish to discuss this further, please feel free to give me a call. Allison and I would be open any time next Tuesday, November 26 for a conference call.

Maddie

Madelyn Smith

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From: Kolak, Shari [<mailto:kolak.shari@epa.gov>]
Sent: Thursday, November 21, 2013 11:11 AM
To: Smith, Madelyn
Subject: East Troy - SAP

Hi Maddie,

Have you finished your review of the Expanded Phase II RI SAP yet? I'd like to schedule a conference call to discuss our comments. I need to approve the SAP soon in order for SulTRAC to bid out the Waterloo job. The Waterloo contractor is available early January so what I discussed with Guy is the possibility of conducting the remaining field work (surface, subsurface, surface water, etc.), minus the Waterloo next month.

I also need to talk to Guy about the Waterloo sampling to ensure we are able to "step out" in the field if we need to.
Shari

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